Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1, 2, and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication US 2001/0049686 of *Nelson et al.* ("*Nelson*") and U.S. Patent no. 5,930,511 of *Hinsley* ("*Hinsley*").

Claims 3-6, 11, 17-20 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Nelson* and *Hinsley* and U.S. Patent no. 3,858,182 of *Delagi et al.* ("*Delagi*").

Claims 5 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Nelson* and *Hinsley* and U.S. Patent no. 5,619,710 of *Travis et al.* ("*Travis*").

Claims 6 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Nelson* and *Hinsley* and U.S. Patent no. 6,158,045 of *You* ("*You*").

Claims 7-10, 14-15, 21-24, and 28-29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Nelson* and *Hinsley* and U.S. Patent no. 6,269,391 of *Gillespie* ("*Gillespie*").

Claims 12-13, and 26-27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Nelson* and *Hinsley* and U.S. Patent no. 5,630,128 of *Farrell et al.* ("*Farrell*").

Claims 1-29 have been cancelled. New claims 30-52 have been added.

The Examiner has rejected claims 1, 2 and 16 under 35 U.S.C. §103(a) as being obvious in view of *Nelson* and *Hinsley*. Applicants respectfully submit, however, that new claim 30 is not obvious in view of the references cited by the Examiner. New claim 30 is a system for adapting threads support in a virtual machine to an underlying platform. *Nelson* and *Hinsley* do not teach or suggest a system for adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30. Instead, *Nelson* discloses a system for computer network management (See Abstract of *Nelson*) and *Hinsley*

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discloses a network of processors for parallel execution of code segments (See Abstract of *Hinsley*).

Nelson does disclose, in one sentence, threads support in a particular underlying platform – the Solaris platform. (*Nelson*, page 3, right column – last two lines and page 5, left column – first two lines) but does not disclose threads support in a virtual machine or adapting threads support in the virtual machine to an underlying platform as claimed in new claim 30.

The Examiner has acknowledged that *Nelson* does not disclose threads support in a virtual machine by stating that

> Nelson fails to explicitly teach:
> - threads interface layer which has a set of methods that provide thread support according to a standard threads interface

(Page 2, Office Action, 1/31/03) (emphasis added). Yet the Examiner has also stated that

> Nelson discloses a software system...comprising:
> - virtual machine ("Java Virtual Machine" [0039]);
> - native threads interface layer which adapts the methods of the threads interface layer to a platform which underlies the software system...

(Page 2, Office Action, 1/31/03) (emphasis added). Applicant submits that if *Nelson* does not disclose a threads interface layer as acknowledged by the Examiner then *Nelson* cannot disclose adapting the threads interface layer as stated by the Examiner.

It is therefore respectfully submitted that the system of new claim 30 for adapting threads support in a virtual machine to an underlying platform is not obvious in view of the scant teachings in *Nelson* of thread support in a particular platform and the processor network of *Hinsley*.

Delagi discloses processor registers (*Delagi*, col. 2, lines 9-21) rather than adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30.

Travis discloses a system for invoking application programs on remote platforms (*Travis*, col. 2, lines 64-66 and

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col. 12, lines 19-22) rather than adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30.

You discloses a software debugging system (*You*, col. 9, lines 15-26) rather than adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30.

Gillespie discloses virtual machine thread scheduling in a multi-processor system (*Gillespie*, col. 1, line 55 through col. 2 line 5) rather than adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30.

Farrell discloses a system for scheduling threads (*Farrell*, col. 2, lines 24-45) rather than adapting threads support in a virtual machine to an underlying platform as claimed in new claim 30.

Given that new claims 31-46 depend from new claim 30, it is submitted that new claims 31-46 are not obvious in view of the references cited by the Examiner.

Applicant also submits that new claim 47 is not obvious in view of the references cited by the Examiner. New claim 47 is a method for adapting threads support in a virtual machine to an underlying platform that includes limitations similar to the limitations of new claim 30. Therefore, the remarks stated above with respect to new claim 30 also apply to new claim 47.

Given that new claims 48-52 depend from new claim 47, it is submitted that new claims 48-52 are not obvious in view of the references cited by the Examiner.

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable objections and rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: 6-2-03   By: _____

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